OU15 No Action Closure Plan

Since it began in 1989, the cleanup of the Rocky Flats Environmental Technology Site, as administered under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), has been centered on 176 suspected contamination spots, called Individual Hazardous Substance Sites across the site. Based on such factors as geography and type of contamination, these sites were grouped into 16 organizational "blocks", called Operable Units, which would allow the Department of Energy and other agencies to plan and monitor the cleanup of Rocky Flats.

Each Operable Unit, according to CERCLA, would undergo a thorough investigative process to determine the type, level and extent of contamination present. Only then would any cleanup actions be recommended. These recommendations would come in the form of an Interim Measure/Interim Remedial Action (IM/IRA) plan.

Now the investigation phase for several Operable Units is nearly complete, and the results are showing contamination in many Individual Hazardous Substance Sites to be more localized and less severe than expected. In some cases, the contamination is so minimal that no further cleanup actions will be needed. In such cases, site officials can petition regulators for closure under a "No Action" Record of Decision.

This is the case in Operable Unit 15, a collection of Individual Hazardous Substance Sites located inside various site buildings. Although radiological and chemical contamination was possible in these sites, further examination found almost none. Based on these findings, DOE and EG&G have developed a Proposed Plan to allow No Action closure of Operable Unit 15.

The Operable Unit 15 Individual Hazardous Substance Sites, located inside Buildings 865, 881, 883 and 447, were all used for storage except for those in Building 447, which housed a uranium chip roaster, and Building 881, where a laboratory hood was used to convert cyanide to cyanate. These last two areas will remain subject to the site's radiological control program, a key factor in the No Action closure proposal.

The first step to a No Action, a *Final Phase I RCRA Facility Investigation/Remedial Investigation Report* for Operable Unit 15, has received approval from the state of Colorado. Approval of this document allows Rocky Flats' operators to pursue closeout of this Operable Unit without submitting an Interim Measure/Interim Remedial Action plan. Eliminating this planning step from the cleanup process will speed up the Operable Unit 15 timetable by at least two months, meaning that final closure could occur by the end of 1995.



Four of the six Individual Hazardous Substance Sites in Operable Unit 15 were once drum storage areas, regulated by the Resource Conservation and Recovery Act (RCRA). Therefore, the Proposed Plan includes a Draft Modification of the Colorado Hazardous Waste Permit for Rocky Flats. By obtaining a modification of the site's hazardous waste permit, Rocky Flats' managers can eliminate regular monitoring and reporting on these now-unused storage areas from the RCRA waste management process, saving both labor and expense.

A public comment period for the *Operable Unit 15 Proposed Plan and Draft Permit Modification* will be held from May 17 to June 30, 1995. The public is also encouraged to comment on the *Final Phase I RCRA Facility Investigation/Remedial Investigation Report*, which presents the investigation results that led to the No Action proposal for Operable Unit 15. A public hearing on the document is scheduled for June 21, 1995, 6:30 - 9:30 p.m.at the Denver Marriot West, I-70 at Exit 263, Golden.

Copies of the Operable Unit 15 Proposed Plan and Draft Permit Modification will be available for review at the following locations:

• Department of Energy Rocky Flats Public Reading Room

Front Range Community College Library

3645 West 112th Avenue

Westminster, CO 80030

The U.S. Environmental Protection Agency - Region VIII

Superfund Records Center

999 - 18th Street - Suite 500

Denver, CO 80222-1530

Rocky Flats Citizens Advisory Board

9035 Wadsworth Parkway - Suite 2250

Westminster, CO 80021

• The Colorado Department of Public Health & Environment

Hazardous Materials and Waste Management Division,

4300 Cherry Creek Drive South, Building 52,

Denver, CO 80222-1530

• Standley Lake Library

8485 Kipling

Arvada, CO 80005

Written comments may be sent to:

Mike Konczal,

DOE-RFFO Office of Communications and Economic Development

Building T117A, PO Box 928, Golden, CO 80402-0928.

Arvada, CO 80005

Written comments may be sent to DOE's External Affairs Office, PO Box 928, Golden, CO 80402-0928.